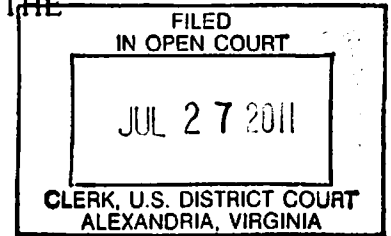


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)
)
 v.) No. 1:11cr282
)
YVONNE ANSAH OWUSU,)
)
 Defendant.)

STATEMENT OF FACTS

The United States and the defendant, YVONNE ANSAH OWUSU, agree that, at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. On May 29, 2011, the defendant arrived at Dulles International Airport (IAD) in Loudon County, Virginia, in the Eastern District of Virginia, from Accra, Ghana.
2. Upon arrival at IAD airport, the defendant and her luggage were inspected by U.S. Customs and Border Protection (CBP) officers. During the secondary examination, CBP officers discovered a bulge within the lining of the defendant's luggage. Upon further examination, CBP officers found concealed within the defendant's luggage two packages containing a brown powdery substance that was determined to be heroin.
3. The total weight of the heroin was approximately 3,309.2 grams.
4. After the defendant was arrested, she told law enforcement officers that someone named "Abdellah" had delivered a suitcase to her at a hotel in Ghana and had told her that the suitcase contained one kilogram of heroin. The defendant also said that Abdellah had told her that she would be paid \$15,000 to transport the suitcase containing heroin to the United States.

5. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the government. It does not include each and every fact known to the defendant or to the government, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

6. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

NEIL H. MACBRIDE
UNITED STATES ATTORNEY

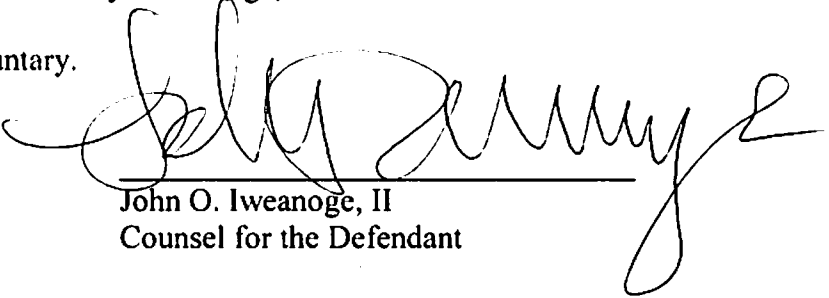
By: 

James P. Gillis
Assistant United States Attorney
Jacquelyn Rivers
Special Assistant United States Attorney

After consulting with my counsel, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


Yvonne Ansah Owusu
Defendant

I am the counsel for the defendant, Yvonne Ansah Owusu. I have carefully reviewed the above Statement of Facts with the defendant. To my knowledge, the defendant's decision to stipulate to these facts is informed and voluntary.


John O. Iweanoge, II
Counsel for the Defendant